

116 052
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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

AUG 11 1988

In Reply Refer To: 3HW12

Mr. Richard J. Kisner
Senior Vice-President
The Allentown Hospital
17th & Chew Streets
Allentown, PA 18102

Re: Novak Sanitary Landfill Site
Lehigh County, Pennsylvania

Dear Mr. Kisner:

This letter is written as a response to your letter of November 11, 1987 to Bruce Smith of the Environmental Protection Agency (EPA) regarding Allentown Hospital's use of the Novak Landfill. In your response you indicate that you had records indicating that the Hospital used the Novak Landfill in 1985 and that policies and procedures exist at the Hospital which limit the disposal of hazardous waste directly into the trash system. EPA records indicate that the Allentown Hospital may have first used the Novak Landfill in 1983. EPA has little information regarding the policies and procedures the Hospital follows to limit the amount of hazardous material disposed into the general trash stream and the types of hazardous substances the Hospital must dispose.

As you know, the EPA is seeking information concerning the release, or the threat of a release, of hazardous substances into the environment from the Novak Sanitary Landfill Site. Pursuant to the authority of Section 3007(a) of the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. Section 6927(a), and Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 ("CERCLA"), 42 U.S.C. Section 9604(e), as amended by the Superfund Amendments and Reauthorization Act of 1986 ("SARA"), public law 99-499, 100 Stat. 1613, your company is again requested to furnish all information and documents in its possession, custody or control, or in the possession, custody or control of any of its officers, employees or agents which concern, refer or relate to hazardous substances as defined by Section 101(14) of CERCLA, 42 U.S.C. Section 9601(14) which were transported to, or stored, or disposed of at the Novak Sanitary Landfill Site in South Whitehall Township, Lehigh County, Pennsylvania.

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EPA currently has information indicating that the owner of the Novak Sanitary Landfill also operated a waste hauling business under the name of Valley Disposal, Inc. or Valley Recycling. Records maintained at the landfill office indicate that wastes hauled by these companies were disposed at the Novak Sanitary Landfill. Your company's name is listed as a customer of Valley Disposal or Valley Recycling and the waste hauled from your company was dumped at the Novak Landfill according to driver records.

EPA has determined that your response to its previous information request letter was inadequate or incomplete. EPA now requests that you further respond to this information request within fifteen (15) days of your receipt of this letter and supply all information and documentation concerning:

1. the types and quantities of hazardous substances generated by the Allentown Hospital;
2. policies and procedures followed by the Hospital to limit the amounts of hazardous substances disposed in the general waste stream;
3. the time period your company contracted with Valley Disposal for the removal of hospital waste;
4. the nature of the waste disposed at Novak Landfill through Valley Disposal;
5. methods of disposal of the hazardous substances generated by Allentown Hospital during the entire time period the Hospital contracted with Valley Disposal; and
6. the volume of wastes containing hazardous substances disposed at the Novak Landfill.

If documentation supporting any statements supplied by the respondent to this letter can not be supplied to EPA, then EPA requests that the source of information; including employee interview, employee recollection, employee name, employee position, etc.; be identified in your response to this letter.

You are entitled to assert a claim of business confidentiality covering any part of the submitted information, in the manner described in 40 C.F.R. Section 2.203(b). Information subject to a claim of business confidentiality will be made available to the public only in accordance with procedures set forth in 40 C.F.R. Part 2, Subpart B. Unless a business confidentiality claim is asserted at the time the requested information is submitted, EPA may make this information available to the public without further notice to you.

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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Please send the required information to:

Michael Towle, Remedial Enforcement Officer
U.S. Environmental Protection Agency
PA. CERCLA Remedial Enforcement Section (3HW12)
841 Chestnut Street, 6th Floor
Philadelphia, Pennsylvania 19107

If you have any questions concerning this matter, please contact
Michael Towle at (215) 597-3166.

Sincerely,

Gregg Crystall, Chief
PA CERCLA Remedial Enforcement Section

Enclosures

204454

Allentown Hospital

CONCURRENCES

OL	Towle	Crystall					
SURNAME	3HW12	3HW12					
DATE	08/10/88						

P 587 283 358

RECEIPT FOR CERTIFIED MAIL

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(See Reverse)

★ U.S.G.P.O. 1983-403-517	Sent to	Mr. Richard J. Kiser
	Senior Vice President	
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	17th & Chew Streets	
	P.O. State and ZIP Code	Allentown, PA 18102
	Postage	\$
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204455 AUG 11 1988		

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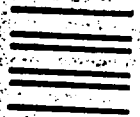


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U.S. F.R. Region 3

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